

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

M.T., a minor by and through his grandmother	§	
and next friend, EDWINA WOODLEY, et al.,	§	
	§	
Plaintiffs,	§	
	§	
vs.	§	C.A. NO.: 2:21-cv-00364
	§	
TATUM UNIFIED SCHOOL DISTRICT,	§	
	§	
Defendant.	§	

PLAINTIFFS' UNOPPOSED MOTION TO CONTINUE TRIAL

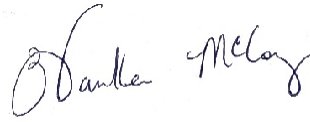
Plaintiffs M.T., a minor by and through his grandmother and Guardian, Edwina Woodley, and K.C., a minor by and through his mother and Guardian, Kambry Cox ("Plaintiffs") by and through their counsel of record, files this Motion to Continue as follows:

1. Trial in this matter is currently set to begin on April 15, 2024.
2. Kambry Cox, mother and Guardian of minor Plaintiff K.C. is pregnant with a due date of April 15, 2024.
3. Plaintiffs K.C. has standardized testing beginning on April 16, 2024 and is required to be in school.
4. Plaintiffs' counsel has conferred with counsel for Defendants and Defendants have agreed not to oppose Plaintiffs' motion for a continuance if the trial date is continued to at least September to account for the summer school break.

5. Plaintiffs respectfully request that the Court continue the trial in this matter currently set for April 15, 2024 until at least September, subject to the Court's availability.

DATED: Mar. 14, 2024

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Waukeen McCoy", is written above a horizontal line.

/s/ Waukeen Q. McCoy

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), I hereby certify that the parties have met and conferred in good faith regarding Plaintiffs' requested relief. On Tuesday, March 12, 2024, Plaintiffs' counsel asked Defendant's counsel if they would stipulate to continuing trial in this matter due to the matters discussed herein. Defendant's counsel responded on Wednesday, March 13 and indicated that they would not oppose a Motion to Continue by Plaintiffs, but could not stipulate to an exact timeframe, given the Court's docket.